

**Jacob Barclay Mitchell**  
Attorney-at-Law  
140 Broadway Suite 4611  
New York, New York 10005  
jacobbarclaymitchell@gmail.com  
Fax 212 858 7750

Telephone 540 273 3400

April 24, 2020

**By ECF**

Hon. Laura Taylor Swain  
United States District Judge  
Southern District of New York  
500 Peal Street  
New York, NY 10007

**MEMO ENDORSED**

*United States v. Ionela Constantinescu,  
19 Cr. 651 (LTS)*

Your Honor:

I represent Ionela Constantinescu in the above-captioned case and I write with the consent of Pretrial Services in Florida respectfully to request that Ms. Constantinescu's bail be modified to allow her to move from her current residence in Florida to an apartment with her husband Mircea Constantinescu. The address she would move to is [REDACTED], Queens, NY 11106.

The reason for the request is that Mr. Constantinescu has been evicted from her home in Florida and is living with neighbors that took her and her two young children in. School has been canceled for the remainder of the year and the initial desire to not disrupt the kids' education is no longer a factor.

The government takes no position in regards to this request. Defense counsel spoke with pretrial services in the SDNY and they have no objection to the request and will help facilitate the transfer of her supervision from Florida to the SDNY. Ms. Constantinescu has remained in perfect compliance with the terms of her release while maintaining employment as a Lyft driver and caring for her children.

Given these circumstances, granting Ms. Constantinescu's request to move to New York to be with her husband and affording her his help in caring for their children and creating a stable living situation where she is no longer relying on the kindness of neighbors and additionally affording her the ability to appear in Court without extensive travel and cost is in the spirit of the "**least restrictive**" combination of conditions needed to ensure her appearance in court. 18 U.S.C. § 3142(c)(1)(B) (emphasis added).

For the foregoing reasons, I respectfully request that the Court endorse this letter

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to allow Ms. Constantinescu to relocate to the address above. Should the Court grant this request, Ms. Constantinescu would begin the process of moving as soon as possible and in accordance with SDNY pretrial services direction. Defense counsel is in contact with the officer assigned in Florida, Mr. Jacoby and Ms. Mejia in the SDNY. Both of them are willing to help facilitate the process and ensure that all the other conditions are maintained throughout the transition. Thank you for your consideration of this request.

Respectfully submitted,

/s/ Jacob Mitchell  
Jacob Mitchell  
*Attorney for Ionela Constantinescu*

cc: AUSAs Robert Sobleman, Elizabeth Hanft, Daniel Loss and Samuel Rothschild  
Pretrial Services Officer Bernisa Mejia (by email)  
Ionela Constantinescu (by text)

The foregoing modification request is granted. DE# 245 resolved.

SO ORDERED.  
4/27/2020  
/s/ Laura Taylor Swain, USDJ